REMARKS

Claims 1-18 are pending in the present Application. The Examiner maintains the 35 U.S.C. §103(a) rejection of claims 1-18 as being unpatentable over Chen et al. (Chen, EPA 0 859 500 A2) in view of Toru (Toru, JPA 08-285086). Applicant respectfully traverses the Examiner's prior art rejection as follows.

As explained in Applicant's previous Amendment filed December 8, 2003, Applicant's claimed invention provides an information search system, a terminal and a center comprising unique combinations of features, including *inter alia*, speech communication between terminal and center via speech signals, speech recognition, and packet communication based on speech recognition for sending and receiving at least one of image information and character information by performing packet communication with the center (see Applicant's independent claims 1, 11, 13 and 18). That is, a feature of Applicant's claimed invention is related to a technique where speech recognition of an uttered person's voice is performed by a speech communication function, where the result of recognition is assigned, for example, a keyword, and is transmitted to a packet communication function. A packet communication function searches information (a letter, an image, etc.) corresponding to the keyword from the Internet, and transmits a message to a terminal. The correlation between both addresses is necessary to convey information between both of these communication functions.

Chen discloses a method and an apparatus for browsing the World Wide Web (WWW) by means of a conventional wireless or wired telephone using interactive voice systems (IVS) "that provide spoken information to users in response to the user's input of TOUCH-TONE^{tm}

(Dual Tone Multi Frequency or DTMF) signals via entries on the telephone keypad, or in response to user's spoken words" (see Id., col. 1, lines 31-38). In particular, Chen discloses an arrangement where "IVS device 42 and gateway processor 44 together are capable of receiving and processing DTMF tones and/or spoken words, and of outputting alphanumeric characters and/or spoken words, as application needs dictate" (see Id., col. 4, lines 24-49).

While, as noted by the Examiner, Chen discloses that the desired information can be delivered to the user "in the appropriate voice and/or text format" (see Id., col. 6, lines 36-39; see also Id., col. 5, lines 9-19), Chen does not disclose, teach or suggest packet communication based on speech recognition for sending and receiving at least one of image information and character information by performing packet communication with the center, as recited in Applicant's independent claims 1, 11, 13 and 18. That is, Chen discloses packet communication only in the context of "wireless packet services" where "the user need not establish a traditional phone call to extract simple information from the Internet" (see Id., col. 5, lines 24-27; and col. 5, line 48 through col. 6, line 13). Thus, Chen teaches away from performing packet communication in conjunction with speech communication, let alone in conjunction with speech recognition, as recited in Applicant's independent claims 1, 11, 13 an 18.

As noted in Applicant's previous Amendment, Toru discloses a method wherein an HTML sentence data obtained as a search result is returned in response to a voice request from a mobile terminal user. On the other hand, as further noted in Applicant's previous Amendment, an objective of Chen's invention is to eliminate the need for providing HTML links (see Chen, col. 1, line 39 through col., 2, line 5). Thus, considering each disclosure, Chen and Toru, in its

entirety, the combination of Chen and Toru is improper. (*See* MPEP §2141.02 (prior art must be considered in its entirety, including disclosures that teach away from the claims), *and* MPEP §2143.01 (proposed modification cannot render the prior art unsatisfactory for its intended purpose or change the principle of operation of a reference).

Therefore, independent claims 1, 11, 13 and 18, as well as the dependent 2-10, 12 and 14-17 (which incorporate all the novel and unobvious features of their respective base claims), would not have been obvious from Chen and Toru at least for these reasons.

In order to further facilitate the Examiner's understanding of the difference between Applicant's claimed invention and the prior art, Applicant respectfully submits the following non-limiting explanation.

First, Applicant's claimed invention would not have been obvious, or possible, even in view of an unlikely combination of Chen and Toru.

That is, the present invention relates to a portable telephone having a "speech communication function" and a "packet communication function" and having the self-station address (self-station voice address and self-station packet address) for each communication. Generally, although it is not necessary to attach strings between both addresses, according to the present invention, speech recognition is made in the center using the "speech communication function", and the recognition result is assigned a key word and communicated to the "packet communication function". The "packet communication function" searches the information corresponding to the key word from the Internet, and transmits it to the terminal. In order to realize this processing, it is necessary that the strings be attached to both addresses, and then the

information be transferred. The present invention proposes a technique to enable the attachment of strings. Neither Chen nor Toru discloses or suggests such a technique. Therefore, even if Chen and Toru were somehow combinable, the resultant combination could not realize the present invention.

Next, according to the present invention (as recited, for example, in Applicant's claim 1.), the terminal (10) has the speech communication function and the packet communication function. In addition, the center (20) has the speech control section (15) and the packet control section (19). By these functions, a search service can be realized independently by each network.

According to a non-limiting example of a search service using the present invention, the search word uttered through the speech line switching network is sent to the center by the speech, the speech recognition is performed at the center, and the search result is returned to the terminal by the speech. In addition, the packet control section 19 returns the search result by the image and the character information. Thus, the following problems of conventional systems may be addressed: (1) if the input is made by the speech, the result is returned by the speech and it is not possible to record the result, and (2) it is not possible to return the image information.

According to other non-limiting examples of search services using the present invention, the character data which are keyed in are sent to the center through the packet network, the character and the image which are the search results at the center are outputted to the screen of the terminal through the packet network, and the search service is realized. In the case of such a search service, according to the present invention, a key word can be inputted by speech, instead of the key, input.

Finally, in order to enable the information exchange between the different centers by making the different terminal ID (speech communication address - telephone number) become related to ID' (IP address) on the different networks (the speech communication network and the packet communication network), according to, for example, Applicant's claim 3, the address of the speech communication function and the address of the packet communication function are registered to make both become related to each other by forming a table 30 (see Applicant's Fig. 3).

Conventionally, in the case of the search service where the search word uttered through the speech line switching network is sent to the center by the speech, the speech recognition is performed at the center, and the character and the image, which are the search results, are outputted to the screen of the terminal through a packet network, and the search results by the search word inputted from the speech communication function are returned as an image character by the packet communication function. In this case, since the speech communication function and the packet communication function are mounted on the same terminal and the address of the speech communication at the terminal side differs from the address of the packet communication, if the correspondence (table (30)) of the address of the speech communication and the address of the packet communication is not known, it will become unclear to which terminal the communication should be transmitted, and it will become impossible to make the return communication.

According to the present invention, one of the non-limiting benefits which may (but not required to) be achieved is that it becomes possible to realize a search service C extending over

different communication networks by corresponding the address of the speech communication and the address of the packet communication using table 30. According to the search service C, the search word uttered through the speech line switching network is sent to the center by the speech, and the speech recognition is performed, and the character and the image which are the search results are outputted to the screen of a terminal through the packet network.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

Stan Torgovitsky
Registration No. 43,958

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: May 25, 2004